



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200

Dallas, TX 75202-2733

June 26, 2013

Salvador Deocampo
Federal Highway Administration
Texas Division
300 East 8th St., Room 826
Austin, TX 78701

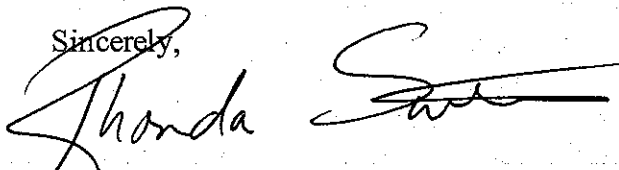
Dear Mr. Deocampo,

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) prepared by the Federal Highway Administration (FHWA), the Texas Department of Transportation (TxDOT), and the Alamo Regional Mobility Authority (RMA).

EPA has rated the DEIS as LO - "Lack of Objections". The EPA's Rating System Criteria can be found here: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. We are enclosing comments that provide recommendations for further clarification in the Final EIS (FEIS).

EPA appreciates the opportunity to review the DEIS. Our classification will be published on the EPA website, <http://www.epa.gov/compliance/nepa/eisdata.html>, according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. Please send our office one copy of the FEIS. If you have any questions or concerns, please contact me at 214-665-8006 or John MacFarlane of my staff at macfarlane.john@epa.gov or 214-665-7491 for assistance.

Sincerely,


Rhonda Smith
Chief, Office of Planning and
Coordination

Enclosure

**DETAILED COMMENTS ON THE
FEDERAL HIGHWAY ADMINISTRATION'S
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
US 281 FROM LOOP 1604 TO BORGFELD DRIVE
BEXAR COUNTY, TEXAS**

BACKGROUND: The Federal Highway Administration (FHWA), the Texas Department of Transportation (TxDOT), and the Alamo Regional Mobility Authority (RMA) are proposing improvements to an approximately eight-mile segment of US 281 from Loop 1604 to Borgfeld Drive in northern Bexar County, Texas. There are two alternatives, the Expressway Alternative and the Elevated Expressway Alternative. The Expressway Alternative would consist of three, full access-controlled through express lanes in each direction. The Elevated Expressway Alternative would consist of two-to-three, elevated full access-controlled through express lanes in each direction.

GENERAL COMMENTS:

Alternatives

EPA supports the Elevated Expressway Alternative because it requires less right-of-way acquisition, impacts less rangeland and residential land use, and crosses fewer karst features. In addition, this alternative would require no residential displacements/relocations.

Air Quality

This document correctly states that the San Antonio-Bexar County Metropolitan Planning Organization (MPO) area is currently in attainment of all National Ambient Air Quality Standards (NAAQS), but is vulnerable to being designated as non-attainment for ozone in the next few years. In addition to the long-range planning initiatives for managing congestion included in the document, the Alamo Area Council of Governments (the San Antonio area MPO) has applied to and been accepted by EPA into the EPA Ozone Advance program. The Advance program is a collaborative effort between EPA, states and local governments to enact expeditious emission reductions to help near non-attainment areas remain in attainment of the NAAQS. This further reflects the sensitivity of ozone levels in the area, and the need for federally-funded projects in the San Antonio area to consider emissions which contribute to the formation of ozone.

Because of the air quality concerns of significant population centers within the DEIS study area, EPA recommends that in order to reduce potential short-term air quality impacts associated with construction activities, the agencies responsible for the project should also include a Construction Emissions Mitigation Plan and adopt this plan in the Record of Decision (ROD). In addition to all applicable local, state, or federal requirements, EPA recommends that the following mitigation measures be included in the Construction Emissions Mitigation Plan in

order to reduce impacts associated with emissions of NO_x, CO, PM, SO₂, and other pollutants from construction-related activities:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate at active and inactive sites during workdays, weekends, holidays, and windy conditions;
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions; and
- Prevent spillage when hauling material and operating non-earthmoving equipment and limit speeds to 15 miles per hour. Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Plan construction scheduling to minimize vehicle trips;
- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections;
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed;
- If practicable, utilize new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible;
- Lacking availability of non-road construction equipment that meets Tier 4 engine standards, the responsible agency should commit to using EPA-verified particulate traps, oxidation catalysts and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site; and
- Consider alternative fuels and energy sources such as natural gas and electricity (plug-in or battery).

Administrative controls:

- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking;
- Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips; and
- Identify sensitive receptors in the project area, such as children, elderly, and infirmed, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).

Noise

The Final EIS (FEIS) should include a discussion of why noise levels vary between the toll and non-toll alternatives.

Groundwater

This project is over the Edwards Aquifer and is subject to federal review under EPA's Sole Source Aquifer (SSA) program. Because new construction must comply with the Texas Commission on Environmental Quality's (TCEQ) regulatory requirements in *Complying with the Edwards Aquifer Rules Technical Guidance on Best Management Practices* and the current *Water Pollution Abatement Plan* (WPAP), the proposed project's stormwater management system should be more protective of the aquifer than the existing roadway.